

633-07/WLJ

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UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

-----X
KIA MOTORS CORPORATION, KIA
MOTORS AMERICA INC., and HYUNDAI
MARINE & FIRE INSURANCE CO. LTD.,

07 CIV 11063 (GBD)

Plaintiffs,

NOTICE OF MOTION

-against-

ENGAGED FUTURE and EUKOR CAR
CARRIERS INC.,

Defendants.
-----X

S I R S:

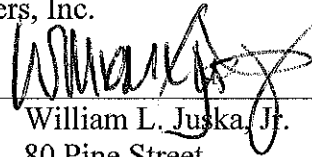
PLEASE TAKE NOTICE, that upon the accompanying Declaration of JAY H. MOON dated March 14, 2008, with Exhibits A and B thereto, the Memorandum of Law, and the pleadings and proceedings herein to date, the Defendant EUKOR CAR CARRIERS INC. moves this Court pursuant to Rule 12(b)(1), (3) and/or (6) for an Order dismissing the Complaint of the Plaintiff herein on the ground that the mandatory jurisdiction clause contained in the Eukor Car Carriers contract of carriage Sea Waybill EUKOKRUS264567W, requires any litigation against EUKOR CAR CARRIERS INC. to be brought before the Seoul Civil District Court in Korea.

PLEASE TAKE FURTHER NOTICE that pursuant to the Local Rules, answering affidavits, declarations and/or memorandum of law in opposition to the requested relief should be served on counsel for Defendant Eukor Car Carriers Inc. on or before March 25, 2008.

Dated: New York, New York
March 14, 2008

FREEHILL HOGAN & MAHAR, LLP
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BY:



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